

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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MARVIN H. MAURRAS REVOCABLE  
TRUST, YONGQIAN ZHAO, and SUSAN  
CHAGNON, Derivatively on Behalf of  
ACCRETIVE HEALTH, INC.

Plaintiff,

v.

EDGAR M. BRONFMAN JR., MICHAEL  
CLINE, STEVEN N. KAPLAN, STANLEY  
N. LOGAN, DENIS J. NAYDEN, ARTHUR  
H. SPIEGEL, III, MARY A. TOLAN, and  
MARK A. WOLFSON,

Defendants,

and

ACCRETIVE HEALTH, INC.

Nominal Defendant.

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Civil Action No. 12-cv-03395

**UNOPPOSED MOTION FOR ENTRY OF LEADERSHIP STRUCTURE ORDER**

In accordance with Fed. R. Civ. P. 16, Plaintiffs Marvin H. Maurras Revocable Trust (“Maurras Trust”) and Yongqian Zhao (“Zhao”); and Interested Party Shareholder Susan Chagnon (“Chagnon,” collectively, the “Plaintiffs”) hereby move for the entry of the proposed leadership structure order. This motion is unopposed by Defendants in this action. In support of this motion, the Plaintiffs state and allege as follows:

1. On October 2, 2012, the parties appeared before the Court for a status and motion hearing. During the hearing, Plaintiff Maurras Trust and Interested Party Shareholder Chagnon informed the Court of an intention to file a consolidated amended complaint and supersede the current operative complaint filed by the Maurras Trust.

2. Upon questioning from the Court, Plaintiff Zhao indicated a willingness to enter into discussions with the Maurras Trust and Chagnon over joining in a single consolidated amended complaint, superseding the current operative complaint filed by Zhao and mootng the motion for lead plaintiff and lead counsel filed on August 8, 2012.

3. Defendants expressed no objection to the proposed consolidation.

4. The Court continued the hearing until October 10, 2012, and directed the parties to continue discussions with the aim of agreeing to a leadership structure and a briefing schedule for the filing of a consolidated amended complaint. The Court indicated that if an agreement were to be reached, the status hearing would be removed from the calendar.

5. Subsequent to the hearing, and pursuant to the direction of the Court, Plaintiffs Maurras Trust and Zhao and Interested Party Shareholder Chagnon conferred and agreed to a leadership structure and to jointly file a consolidated amended complaint, superseding all previously filed complaints.

6. In light of this agreement, the Plaintiffs respectfully request that the following proposed leadership structure be approved:

- Co-lead Plaintiffs will be (1) Marvin H. Maurras Revocable Trust; (2) Yongqian Zhao; and (3) Susan Chagnon.
- Co-lead counsel will be (1) Scott+Scott LLP; (2) Faruqi & Faruqi, LLP; and (3) Carney Williams Bates Pulliam & Bowman PLLC.

- Co-liaison counsel will be (1) Freed Kanner London & Millen, LLC; and (2) Wexler Wallace LLP.

7. The Plaintiffs respectfully request that this leadership structure govern any later filed shareholder derivative cases, including any transferred or removed cases, asserting claims on behalf of the same nominal Defendant, Accretive Health, Inc., arising out of similar facts.

8. The proposed leadership structure serves the interests of judicial economy and efficiency, and will allow co-lead plaintiffs to benefit from the pooled resources of co-lead counsel.

Dated: October 19, 2012

Respectfully submitted,  
**WEXLER WALLACE LLP**

/s/ Amy E. Keller  
Edward A. Wallace  
Amy E. Keller  
55 West Monroe, Suite 3300  
Chicago, Illinois 60603  
Telephone: (312) 346-2222  
Fax: (312) 346-0022

**CARNEY WILLIAMS BATES PULLIAM  
& BOWMAN PLLC**

Allen Carney  
Randall K. Pulliam  
11311 Arcade Dr., Suite 200  
Little Rock, AR 72212  
Telephone: (501) 312-8500  
Fax: (501) 312-8505

*Counsel for Plaintiff Marvin H. Maurras  
Revocable Trust*

**SCOTT+SCOTT LLP**

Judith S. Scolnick  
The Chrysler Building  
405 Lexington Avenue, 40<sup>th</sup> Floor  
New York, NY 10174

Telephone: (212) 223-6444  
Fax: (212) 223-6334

-and-

Walter W. Noss  
Joe Pettigrew  
707 Broadway, Suite 1000  
San Diego, CA 92101  
Telephone: (619) 233-4565  
Fax: (619) 233-0508

**FARUQI & FARUQI, LLP**

Michael J. Hynes  
Ligaya T. Hernandez  
101 Greenwood Avenue, Suite 600  
Jenkintown, PA 19046  
Telephone: (215) 277-5770  
Fax: (215) 277-5771

**FREED KANNER LONDON & MILLEN, LLC**

Michael Freed  
2201 Waukegan Road, Suite 130  
Bannockburn, IL 60015  
Telephone: (224) 632-4500  
Fax: (224) 632-4521

*Counsel for Plaintiff Susan Chagnon*

**SUSMAN HEFFNER & HURST**

Glenn L Hara  
Matthew Thomas Heffner  
30 North LaSalle Street  
Suite 1210  
Chicago, IL 60602  
Telephone: (312) 346-3466  
Fax: (312) 346-2829

**KAHN SWICK & FOTI, LLC**

Lewis S. Kahn  
Albert M. Myers  
Melinda A. Nicholson  
206 Covington Street  
Madisonville, LA 70447  
Telephone: (504) 455-1400

Fax: (504) 455-1498

*Counsel for Plaintiff Yongquian Zhao*

**CERTIFICATE OF SERVICE**

The foregoing Unopposed Motion for Entry of Leadership Structure Order was filed this 19th day of October, 2012, via this Court's CM/ECF electronic filing system, which will send notices of this electronic filing to all parties registered to receive such notice. Those not registered for electronic notice will be served via regular U.S. Mail.

/s/ Amy E. Keller

Amy E. Keller

WEXLER WALLACE LLP

55 West Monroe, Suite 3300

Chicago, Illinois 60603

Telephone: (312) 346-2222

Fax: (312) 346-0022

*Counsel for Plaintiff Marvin H. Maurras  
Revocable Trust*